

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF MICHIGAN**

In re:

CHAPTER 11

FAMILY CHRISTIAN, LLC *et al.* ¹

**CASE NO. 15-00643-jtg
(Jointly Administered)**

Debtors.

HON. JOHN T. GREGG

**NOTICE OF PROPOSED AGENDA OF MATTERS SCHEDULED
FOR HEARING ON JUNE 9, 2015 AT 9:00 A.M.**

The above captioned debtors (the "**Debtors**") submit the following proposed agenda for matters scheduled for hearing on June 9, 2015 at 9:00 A.M.

I. CONTESTED MATTER

- A. Debtors' Motion for (1) An Order (A) Approving Procedures for the Sale of Substantially All of the Debtors' Assets and The Assumption and Assignment of Certain Executory Contracts and Unexpired Leases (B) Approving the Establishment of Cure Amounts and (C) Scheduling a Final Sale Hearing and Approving the Form and Manner of Notice Thereof, and (II) An Order Authorizing the Sale of Substantially All of the Debtors' Assets Free and Clear of Liens and (B) Authorizing the Assumption and Assignment of Executory Contracts and Leases, and (C) Granting Related Relief. [DN487]

Response Deadline: June 04, 2015.

Objections Received.

- Objection to FC Acquisition.
 1. U.S. Trustee [DN 565, DN 576 Correction, DN 843]
 2. Credit Suisse AG [DN840, DN 842]
 3. Hilco Merchant Resources LLC [DN 845]

¹ The Debtors are: Family Christian, LLC(Case No. 15-00643-jtg), Family Christian Holding, LLC (Case No. 15-00642-jtg), and FCS Giftco, LLC (Case No. 15-00644-jtg).

- Objection to Hilco.

1. Ad Hoc Consortium of Consignment Vendors [DN 571, DN 828]
2. Official Creditors Committee [DN 572, DN 812]
3. Provident Distribution LLC [DN 832]
4. FC Special Funding Objections [DN 820, DN 821, DN 835]

- Objection by Landlords.

1. Simon Property Group Inc. to Washington Prime Group Inc.'s Objection [DN 321] *This Joinder adopts WP's objection was to our original sale motion [DN 30] which was withdrawn.* [DN 550]
2. Washington Prime Group d/b/a WP Glimcher [DN 559, DN 837]
3. IA South Frisco Village LLC, IA Fultondale Promenade LLC, MB Sioux City Lakeport LLC, Inland Orlando LaGrange Rd. Outlot LLC and Greenville (Woodruff) WMB LLC [DN 562, DN 823]
4. Mall Road Shoppes of Florence LLC, Mohawk Properties Two LLC, and Reliance Salisbury LLC. [DN 567, DN 834]
5. Acadia Realty Trust, GEM Realty Capital, Inc., Starwood Retail Partners LLC, The Prudential Insurance Company of America [DN 568, DN 830]
6. Cornerstone Tinley Park LLC. [DN 575]
7. Greenville (Woodruff) WMB, LLC [DN 822]
8. World Vision USA [DN 826]
9. Baldwin Commons, LLC, CFH Realty III/Sunset Valley, LP, Covington Lakeland Acquisition 1, LLC through 33, LLC, Cranberry Commons Center I Limited Partnership, Ct Retail Properties Finance IV, LLC, Hawthorn Hills Square 1687, LLC, KIR Augusta II, LP, Monroeville SC LP, PK I North Country Plaza LP, PK I Olympia Square, LLC, PL Dulles LLC, PL Millenia Plaza II, LLC, PL Rancho, LP, Ramco Canton LLC, Ramco West Oaks II LLC, Ramco-Gersherson Properties, UrbanCal Oakland Plaza, LLC [DN 833]
10. Anchor Distributors (Whitaker Corporation), Angel Star Inspired Products, Inc., Daywind, Destiny Image, Inc., Dexsa Company, Send The Light Distribution, LLC [DN 836]
11. FacilitySource, LLC f/k/a FacilitySource, Inc. [DN 838]
12. Brixmor Property Group, Inc. [DN 841]
13. DDR Corp., Regency Centers, L.P., Rouse Properties Inc., Weingarten Realty Investors [DN 846]
14. Cole MT Canton Marketplace, LLC and Cole MT Clarksville IN, LLC [DN 856]
15. Cobblestone Square Company, Ltd., Georgia Properties Limited Partnership [DN 859]

- Objections by Consignors and Reclamation Claimants.

1. Bridgestone Multimedia Group/Alpha Omega Publications [DN574, DN 667, DN 847]
2. MAG Jewelry Co. – Credit Bidding [DN 670]
3. David Cook – Credit Bidding [DN 671]

- Objections by Taxing Authorities.

1. El Paso County [DN 733]
2. Henrico County VA [DN 752]
3. Local Texas Tax Authorities [DN 810]

Cure Cost Objections/Responses Received.

1. Taubman Landlords a/k/a Fairfax Company Of Virginia L.L.C. [DN 717]
2. Velcor Leasing Corp [DN720]
3. Henrico County, Virginia [DN752]
4. Danville Mall [DN 757]
5. Flint Genesee Crossing LLC [DN 765]
6. UPS [DN 766]
7. CTW-Superstition Gateway West, LLC [DN 771]
8. GE Fleet Services [DN 791]
9. GEM Realty Capital Inc. Starwood Retail Partners LLC, and The Prudential Insurance Company of American and Acadia Realty Trust [“Landlords”] [DN 798]
10. Citadel Crossing Associates [DN804 stricken]
11. Facility Source LLC [DN806]
12. Infor (US), Inc. successor in interest to Lawson Associates, Inc and Epiphany Inc. [DN809]
13. Los Banos Gravel Co, Inc. [DN813]
14. Whitehall Crossing A, LLC [DN815]
15. RPAI Southwest Management LLC and RPAI US Management LLC [DN818]

Status. Debtors propose that cure cost objections not resolved be adjudicated at a later hearing to be set by the Court.

END OF AGENDA

Dated: June 8, 2015

Respectfully submitted,
KELLER & ALMASSIAN, PLC

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